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18 Attorneys for Plaintiff

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA

21 ALLAN CANDELORE, On Behalf of Himself) No. C-07-05182-WHA
22 and All Others Similarly Situated,)
23 Plaintiff,) CLASS ACTION
24)
25 vs.)
26 LDK SOLAR CO., LTD., et al.,)
27)
28 Defendants.)
29 _____) No. C-07-05205-CRB
30 THOMAS O' REILLY,)
31)
32 Plaintiff,) CLASS ACTION
33)
34 vs.)
35 LDK SOLAR CO., LTD., et al.,)
36)
37 Defendants.)
38 _____)

39 [Caption continued on following page.]

40 **STIPULATION AND [PROPOSED] ORDER CONSOLIDATING RELATED**
41 **ACTIONS AND DEFERRING RESPONSE DATE**

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1 FREDRICK GRENWALD, individually and) No. C-07-05259-MHP
on Behalf All Others Similarly Situated,)
2) CLASS ACTION
3 Plaintiff,)
4 vs.)
5 LDK SOLAR CO., LTD., et al.,)
6 Defendants.)
7 _____)
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1 WHEREAS, there are currently three related securities class action lawsuits instituted on
 2 behalf of the stockholders of LDK Solar Co. Ltd. (“LDK”) pending in this District;

3 WHEREAS, consolidation of these related actions will promote judicial economy, avoid
 4 duplicative law and motion and discovery proceedings, and streamline adjudication of these related
 5 matters;

6 WHEREAS, a lead plaintiff has not yet been appointed pursuant to 15 U.S.C. §78u
 7 4(a)(3)(B) of the Securities Exchange Act of 1934;

8 WHEREAS, LDK and LDK Solar USA, Inc., through their counsel of record indicated
 9 below, have agreed to waive process of service without waiving any challenges as to jurisdiction or
 10 venue; and

11 WHEREAS, the agreed-upon schedule is not for the purpose of delay, promotes judicial
 12 efficiency, and will not cause prejudice to either party,

13 IT IS HEREBY STIPULATED by the parties, through their counsel of record, that:

14 1. The following actions are hereby consolidated for all purposes, including pretrial
 15 proceedings, trial and appeal, pursuant to Fed. R. Civ. P. 42(a):

Abbreviated Case Name	Civil Case No.	Date Filed
<i>Candelore v. LDK Solar Co., Ltd., et al.</i>	07cv05182	10/09/07
<i>O'Reilly v. LDK Solar Co., Ltd., et al.</i>	07cv05205	10/11/07
<i>Greenwald v. Peng, et al.</i>	07cv05259	10/16/07

16 2. The caption of these consolidated cases shall be “*In re LDK Solar Securities*
 17 *Litigation*” and the files of this action shall be maintained in one file under Master File
 18 No. C-07-05182-WHA. Any other actions now pending or hereafter filed in this District which arise
 19 out of the same facts and claims as alleged in these related actions shall be consolidated for all
 20 purposes, if and when they are brought before this Court and the Court accepts the transfer and
 21 approves consolidation;

22 3. Without waiving any challenges to jurisdiction or venue, LDK and LDK Solar USA,
 23 Inc., through their counsel of record indicated below, agree to waive process of service;

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1 as lead counsel by regular mail, but must continue to serve lead plaintiff's counsel by overnight mail
2 service, hand delivery, or facsimile.

3 IT IS SO STIPULATED.

4 DATED: November 6, 2007

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15 Attorneys for Plaintiff Allan Candelore

16 DATED: November 6, 2007

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1 DATED: November 6, 2007

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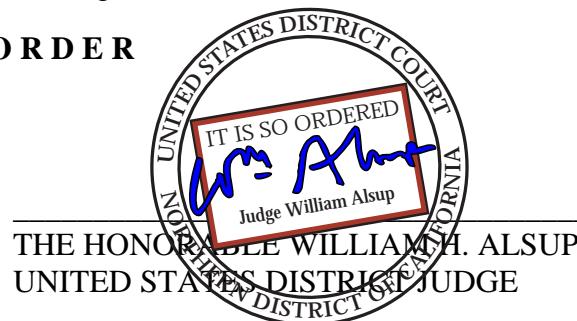
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25 Attorneys for Defendants LDK Solar Co., Ltd.,
LDK Solar USA, Inc., Xiaofeng Peng, XingXue
Tong, and Jack Lai

26 O R D E R

27 IT IS SO ORDERED.

28 DATED: November 7, 2007.



CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 6, 2007.

s/ MARY K. BLASY
MARY K. BLASY

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Mailing Information for a Case 3:07-cv-05182-WHA

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)